



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

June 17, 2020

VIA ELECTRONIC MAIL

Mr. John Paluszak
Director Safety, Health and Environmental Affairs
Santolubes Manufacturing, LLC
PO Box 6740
Spartanburg, South Carolina 29304
jpaluszak@santolubes.com

SUBJ: Request for Information
Santolubes Manufacturing, LLC., EPA ID# SCD003349065

Dear Mr. Paluszak:

On July 18, and 19, 2019, the U.S. Environmental Protection Agency and the South Carolina Department of Health and Environmental Control (SCDHEC), conducted a RCRA compliance evaluation inspection (CEI) at Santolubes Manufacturing, LLC facility located at 2155 West Croft Circle in Spartanburg, South Carolina. The purpose of the CEI was to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA) and South Carolina Hazardous Waste Management Act (SCHWMA), and applicable regulations.

Pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, Santolubes Manufacturing, LLC is hereby directed to respond, fully and truthfully, within thirty (30) calendar days of receipt of this letter, to the Information Request enclosed herein as Enclosure C (subject to the Instructions in Enclosure A, and the Definitions in Enclosure B). Compliance with this request for information is mandatory, and information provided by Santolubes Manufacturing, LLC may be used by the EPA in future enforcement actions. Failure to respond fully and truthfully to each and every question or information request within thirty (30) calendar days of receipt of this letter, or to adequately justify such failure to respond, may result in further enforcement action against Santolubes Manufacturing, LLC by the EPA pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.

Your response to this request for information should be emailed to:

Raj Aiyar
Land, Asbestos and Lead Section
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 4
aiyar.raj@epa.gov

Internet Address (URL) <http://www.epa.gov>

The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. Santolubes Manufacturing, LLC may, if desired, assert a business confidentiality claim covering part or all the information requested, in the manner described in 40 C.F.R. § 2.203(b), by attaching to such information, at the time it is submitted, a suitable notice employing language such as trade secret or proprietary or company confidential. Information covered by such a claim will be disclosed by the EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by the EPA, it may be made available to the Public by the EPA without further notice to Santolubes Manufacturing, LLC. The EPA will construe the failure to furnish a confidentiality claim with your response to this letter as a waiver of that claim. Santolubes Manufacturing, LLC should read the above-cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

This Information Request is not subject to the approval requirement of the Paper Reduction Act of 1980, 44 U.S.C. § 3501 et seq.

Should you have any questions on this matter, please contact Raj Aiyar of my staff, by phone at (404) 562-8993 or by email at aiyar.raj@epa.gov.

Sincerely,

Kimberly L. Bingham
Acting Chief
Chemical Safety and Land Enforcement Branch

Enclosure

ENCLOSURE A

INFORMATION REQUEST INSTRUCTIONS:

1. Identify the person(s) responding to these Information Requests on behalf of Respondent.
2. A separate response must be made to each of the Information Requests set forth herein.
3. Precede each answer with the number of the Information Request to which it corresponds.
4. In answering each Information Request question, identify all documents and persons consulted, examined, or referred to in the preparation of each response and provide true and accurate copies of all such documents.
5. If information not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to the EPA. Moreover, should you find at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth; you must notify the EPA thereof as soon as possible.
6. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.
7. Where specific information has not been memorialized in a document, but is nonetheless responsive to the Request, you must respond to the question with a written response.
8. If information responsive to this Information Request is not in your possession, custody or control, then identify the person from whom such information may be obtained.
9. If you have reason to believe that there may be persons able to provide a detailed or complete response to any Information Request question or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
10. The information requested herein must be provided even though the Respondent may contend that it includes possibly confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Section 3007(b) of RCRA, 42 U.S.C. Section 6927(b), Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. Sections 9604(e)(7)(E) and (F), and 40 C.F.R. Section 2.203(b), by attaching to such information at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as trade secret, or proprietary, or company confidential. Information covered by such a claim will be disclosed by the EPA only to the extent, and only by means, of the procedures set forth in statutes and regulation set forth above. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

ENCLOSURE B

INFORMATION REQUEST DEFINITIONS:

The following definitions shall apply to the following words as they appear in this Enclosure.

1. The terms AND and OR shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside their scope.
2. The term DISPOSAL shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any water, including groundwater.
3. The term DOCUMENT and DOCUMENTS shall include writings of any kind, formal or informal, whether or not wholly or partially in handwriting (including by way of illustration and not by way of limitation), any invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, inter-office or intra-office communications, photostat or other copy of any documents, microfilm or other film record, photograph, sound recording on any type of device, punch card, disc or disc pack, tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use punch card, disc, disc pack, tape or the type of memory) including; (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure, notation, annotation, or the like of it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.
4. The term FACILITY shall mean Santolubes Manufacturing, LLC located at 2155 West Croft Circle in Spartanburg, South Carolina.
5. The term GENERATION shall mean any act or process which produces hazardous waste as identified or listed in 40 C.F.R. Part 261 or an act which first causes a hazardous waste to become subject to regulation.
6. The term HAZARDOUS SUBSTANCE means: (a) any substance designated pursuant to Section 311(b)(2)(A) of the Federal Water Pollution Control Act; (b) any element, compound, mixture, solution, or substance designated pursuant to Section 102 of CERCLA; (c) any hazardous waste having the characteristics identified under or listed pursuant to Section 3001 of RCRA (but not including any waste the regulation of which under RCRA has been suspended by Act of Congress); (d) any toxic pollutant listed under Section 307(a) of the Federal Water Pollution Control Act; (e) any hazardous air pollutant listed under Section 112 of the Clean Air Act; and (f) any imminently hazardous chemical substance or mixture with respect to which the Administrator of the EPA has taken action pursuant to Section 7 of the Toxic Substances Control Act. The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under subparagraphs (a) through (f) of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas,

ENCLOSURE B

or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas). HAZARDOUS SUBSTANCE shall include any mixtures of such hazardous substances with any other substances including petroleum products.

7. The term HAZARDOUS WASTE means a hazardous waste as defined in 40 C.F.R. § 261.3.
8. The term IDENTIFY means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
9. The term IDENTIFY means, with respect to a corporation, partnership, business trust or other associate of a business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
10. The term IDENTIFY means, with respect to a document, to provide its customary business description, date, number, if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.
11. The term PERSON includes, in the plural as well as the singular, any natural person, firm, unincorporated associate partnership, corporation, trust or other entity.
12. The term POLLUTANT or CONTAMINANT shall include, but not be limited to, any element, substance, compound or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including a malfunction in reproduction) or physical deformation in such organisms or their offspring; except that the term POLLUTANT or CONTAMINANT shall not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under subparagraphs (a) through (f) of Definition 5 above, and shall not include natural gas, liquefied natural gas, or synthetic gas of pipeline quality (or mixtures of natural gas and such synthetic gas). POLLUTANT or CONTAMINANT shall include any mixtures of such pollutant and contaminants with other substances, including petroleum products.
13. The term RELEASE shall include any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
14. The term TRANSACTION or ARRANGEMENT shall mean every separate agreement, act, deal, instance or occurrence.
15. The term YOU or RESPONDENT shall mean the addressee of this Information Request, the addressee's officers, managers, employees, contractors, trustees, successors, assigns, and agents.

ENCLOSURE C

INFORMATION REQUEST

Background for Request

On July 18, and 19, 2019, the EPA and SCDHEC, conducted a RCRA CEI at Santolubes Manufacturing, LLC facility in Spartanburg, South Carolina to determine the facility's compliance status with the RCRA and SCHWMA. At the time of the CEI, documentation demonstrating the facility's compliance with the financial assurance requirements of the Permit and applicable regulations were not available for review or inspection.

Request

1. Provide the most recent detailed closure, post closure and corrective action cost estimates for the Santolubes Manufacturing, LLC facility as required by Postclosure Care Hazardous Waste Permit Number SCD003349065, effective June 5, 2012 (the Permit), and 40 C.F.R. Part 264/265 Subpart H and/or 40 C.F.R. § 264.101.
2. Provide documentation demonstrating that financial assurance mechanism(s) have been obtained to comply with the Permit, and 40 C.F.R. § 264.143 or 40 C.F.R. § 264.145, and/or 40 C.F.R. § 264.101. At a minimum, this documentation must include a copy of the financial assurance mechanism. If such documentation does not exist, please state so and provide evidence of all efforts to obtain financial assurance as required.
3. Provide evidence that the cost estimates identified in Request 1 have been adjusted annually for inflation 60 days prior to the anniversary date of the establishment of the financial assurance mechanism(s) identified in response to Request 2.
4. Provide the following financial documentation and information regarding Santolubes Manufacturing, LLC's inability to obtain financial assurance:
 - a. 3-5 of the most recently signed annual income tax returns, including all attachments and schedules.
 - b. 3-5 of the most recent annual financial statements.
 - c. A statement generally explaining the inability to secure financial assurance, including information necessary to support such a claim.
 - d. The completed enclosed form "EPA Financial Statement for Businesses."
 - e. Other documents that you may deem appropriate to support or explain the claim of inability to secure financial assurance.
 - f. The most current balance sheet and income statement for the company.

EPA Financial Statement for Businesses

1. Name (Debtor) _____ Type: For Profit
2. Business Address _____
Street City State Zip

Note: Attach Schedule of all Business Addresses

3. Foreign _____ Domestic _____

4. Legal form of business organization during last five (5) years.

_____ Corporation _____ Subchapter S Corporation

_____ Partnership _____ Proprietorship

_____ Limited Liability Company _____ Trust

_____ Other? _____

5. State of incorporation _____ Date of incorporation _____

6. Name of registered agent _____

7. Address of registered agent _____

8. Name and address of principal stockholders. Number of shares owned by each. (If more than 7 shareholders, list only those with 5% or more stock ownership.)

Total outstanding shares _____

	<u>Name</u>	<u>Address</u>	<u>Shares</u>
(1)	_____	_____	_____

(2)	_____	_____	_____

(3)	_____	_____	_____

(4)	_____	_____	_____

(5)	_____	_____	_____

(6)	_____	_____	_____

(7)	_____	_____	_____

9. (A) Name and address of current (and for previous five years) officers and number of shares held by each. (If more than 7 shareholders, list only those who had 5% or more ownership)

	<u>Name</u>	<u>Address</u>	<u>Shares</u>	<u>Terms</u>
(1)	_____	_____	_____	_____

(2)	_____	_____	_____	_____

(3)	_____	_____	_____	_____

(4)	_____	_____	_____	_____

(5)	_____	_____	_____	_____

(6)	_____	_____	_____	_____

(7)	_____	_____	_____	_____

(B) Name and address of current (and for previous five years) members of board of directors and number of shares held by each. *(Attach additional sheets as needed)*

	<u>Name</u>	<u>Address</u>	<u>Shares</u>	<u>Terms</u>
(1)	_____	_____	_____	_____

(2)	_____	_____	_____	_____

(3)	_____	_____	_____	_____

(4)	_____	_____	_____	_____

(5)	_____	_____	_____	_____

(6)	_____	_____	_____	_____

(7)	_____	_____	_____	_____

10. Has this organization ever issued a prospectus for the sale of stock? YES () NO ().
If Yes, list date, number, and type of shares for each prospectus during the last five years.

(A) Registration on national or local stock exchange(s). (Give details, including date of registration and/or delisting).

(1) _____

(2) _____

- (B) Total authorized shares for each type issued and present market value per share on each type of stock (or book value if not actively traded).

	<u>Type of Shares</u>	<u>Total Shares</u>	<u>Book Value</u>	<u>Market Value</u>
(1)	_____	_____	_____	_____
(2)	_____	_____	_____	_____
(3)	_____	_____	_____	_____
(4)	_____	_____	_____	_____

- (C) Total outstanding shares of each type of stock currently being held as treasury stock.

- (D) Total outstanding shares of each type of stock.

- (E) Amount of bonded debt and principal bondholders.

11. List states and municipalities to which taxes have been paid and/or are being paid. Describe nature and amount of such taxes, state most recent year of payment thereof and whether tax payments are current.

12. Has this organization filed United States income tax returns during the last 5 years?
Yes () No ()

To which Internal Revenue Service Office(s) _____

What years? _____

Are Federal tax payments current? Yes () No ()

Provide income tax returns for the latest five (5) years.

13. Name and address of:

(A) Organization's Independent Certified Public Accountants

(B) Attorney(s) retained by organization from:

_____ To _____

-
-
14. Has this organization filed financial forms with any organization or government entity? List name of organization or entity, date and type of financial form.
-
-

15. Does this organization have financial statements (i.e. income statement, balance sheet, statement of changes in financial position etc.) for the five most recent calendar or fiscal years?
YES () NO ()

If yes, submit one copy of each. (Audited or certified financial statements are preferred). **If financial statements are submitted, answer only questions (2)(a), (2)(b), and (3)(a).**

(1)	<u>Assets</u>	<u>Amounts</u>				
Years	_____	_____	_____	_____	_____	
Cash	\$_____	_____	_____	_____	_____	
Securities	\$_____	_____	_____	_____	_____	
Existing						
Facilities	\$_____	_____	_____	_____	_____	
Equipment	\$_____	_____	_____	_____	_____	
Original Cost	\$_____	_____	_____	_____	_____	
Depreciation	\$_____	_____	_____	_____	_____	
Inventory	\$_____	_____	_____	_____	_____	
Accounts						
Receivable	\$_____	_____	_____	_____	_____	
Other	\$_____	_____	_____	_____	_____	
Total Assets	\$					

(2) Liabilities and
Stockholders

Specify Years

Equity _____

Loans Payable¹

Principal \$ _____

Monthly
Payments \$ _____

Mortgages²

Principal \$ _____

Monthly
Payments \$ _____

Accounts
Payable \$ _____

Deferred
Taxes \$ _____

Insurance
Premiums \$ _____

¹ Complete loan information as requested on page 8, under a) Loans Payable.

² Complete mortgage information as requested on page 8, under b) Mortgages Payable.

Other \$ _____

Stockholder's Equity

Common

Stock \$ _____

Paid-in-

Capital \$ _____

Retained

Earnings \$ _____

Total Liabilities and

Stockholder's

Equity \$ _____

a) Loans Payable

	<u>Owed to/Purpose</u>	<u>Term/Interest Rate</u>	<u>Collateral/Cosigner</u>
1)	_____	_____	_____
2)	_____	_____	_____
3)	_____	_____	_____

	<u>Monthly Payments</u>	<u>Original Amount/Date</u>	<u>Collateral/Cosigner</u>
1)	_____	_____	_____
2)	_____	_____	_____
3)	_____	_____	_____

b) Mortgages Payable

	<u>Owed to/Purpose</u>	<u>Term/Interest Rate</u>	<u>Collateral/Cosigner</u>
1)	_____	_____	_____
2)	_____	_____	_____
3)	_____	_____	_____

	<u>Monthly Payments</u>	<u>Original Amount/Date</u>	<u>Present Balance</u>
1)	_____	_____	_____
2)	_____	_____	_____
3)	_____	_____	_____

(3) Income/Expenses

Gross Income

Net Sales	\$_____	_____	_____	_____	_____
Interest					
Income	\$_____	_____	_____	_____	_____
Dividends	\$_____	_____	_____	_____	_____
Other	\$_____	_____	_____	_____	_____

Operating Expenses

Wages \$ _____

Overhead \$ _____

Lease Pmts \$ _____

Interest
Expense \$ _____

Cost of
Sales \$ _____

Net Income \$ _____

a) In addition, provide the following firm size information:

(1) Number of employees _____

(2) Size of warehouse _____

(3) Number and size
Of shipments _____

16. Does this organization maintain bank accounts: YES () NO ()

If yes, give names and addresses of banks, savings and loan associations, and other such entities, within the United States or located elsewhere. Indicate name and number of accounts and balances.

(A) Banks

<u>Name of Bank</u>	<u>Account #</u>	<u>Balance (Approximate)</u>

(B) Savings & Loan Associations or Other Such Entities

<u>Name of Entity</u>	<u>Account #</u>	<u>Balance (Approximate)</u>

(C) Trust Account(s)

<u>Name of Entity</u>	<u>Account #</u>	<u>Balance (Approximate)</u>

(D) Other Account(s)

<u>Name of Entity</u>	<u>Account #</u>	<u>Balance (Approximate)</u>

17. List all commercial paper, negotiable or non-negotiable in which the organization has any interest whatsoever, presently in transit or in the possession of any banking institution. Describe such paper and the organization's interest therein, and state its present location. List all accounts and loans receivable in excess of \$300.00 and specify if due from an officer, stockholder, or director.

18. Has this organization engaged in any joint loan agreements, including letters of credits, with any other organization(s)? YES () NO () If yes, describe all such agreements.

19. Does this organization have any debt coinsured by another organization? YES () NO ()
If yes, describe all such agreements.

20. List all equity participation in other organizations both domestic and foreign in which this organization has an interest, including the type, amount and terms of such interest.

21. List all debt participation in other organizations both domestic and foreign in which this organization has an interest, including the type, amount and terms of such interest.

22. Is this organization presently:

(A) Active
(Answer no for inactive; but, still in business) Yes () No ()

(B) Void and/or terminated State authorities Yes () No ()

(C) Otherwise dissolved

1) Date _____

2) By whom _____

3) Reason _____

23. (A) List corporate salaries to and/or drawings of the following personnel for the last five taxable years:

Position	Specify Year					
(Including officers)						
President	\$					
Chairman/Board	\$					
Secretary	\$					
Treasurer	\$					
Member(s) – LLC	\$					
Other _____	\$					

- (B) List the five most highly compensated employees or officers other than above, describe position and set forth annual salary and/or bonus for last five taxable years:

		Specify Year					
<u>Name</u>	<u>Position</u>						
1. _____	_____	\$					
2. _____	_____	\$					
3. _____	_____	\$					

4. _____ \$ _____

5. _____ \$ _____

- (C) Describe the nature of the compensation paid to the persons listed in (A) and (B) above and set forth any stock options, profit sharing, royalties, or other deferred compensation rights of said persons.

24. List organizations commercial activity (fields of activity resulting in income) and SIC Code.

	<u>Commercial Activity</u>	<u>SIC Code</u>
Primary	_____	_____
Other 1.	_____	_____
Other 2.	_____	_____
Other 3.	_____	_____

25. List all other supplementary fields of activity in which this organization is engaged, either directly, through subsidiaries, or affiliates, stating the name(s) and state(s) of incorporation of such subsidiaries or affiliates.

26. Has this organization at any time been the subject of any proceeding under the provisions of any state insolvency law or the Federal Bankruptcy Act, as amended? YES () NO ()
If yes, supply the following information as to each such proceeding:

(A) Date (Commencement) _____

(B) Date (Termination) _____

(C) Discharge or other disposition, if any, and operative effect thereof:

(D) State Court _____ Federal Court _____
County District

(E) Docket No. _____

27. (A) List all real estate, and personal property of an estimated value in excess of \$500.00 owned or under contract to be purchased by this organization and where located:

(B) List and describe all judgments, recorded and unrecorded:

Against the organization

In favor of the organization

-
- (C) List and describe all other encumbrances against real estate owned by the organization:
(include but not limited to mortgages, recorded or unrecorded)
-
-
-

- (D) List and describe all other encumbrances (including but not limited to security interest,
whether preferred or not) against any such personal property owned by the organization
as is listed in 27 (A) above.
-
-
-

- (E) List and describe location of real state, including real estate being purchased under
contract, with name and address of seller and contract price:
-
-
-

28. List all life insurance, now in force on any or all officers, directors, and/or key employees, setting forth face amounts, names of life insurance companies and policy numbers where this organization has an Ainsurable interest@ and/or is paying the premium or part of same. Where applicable, indicate under which policy(s) this organization is a beneficiary, type policy(s), yearly premium and location of policy(s). In addition, describe the conditions of and borrowing options available under each policy.

29. For the following types of policies, list all primary and excess insurance policies, the deductible amounts, per occurrence and aggregate coverage limit for each policy. List all policies held by the firm (or predecessor firms) starting from the date which the pollution incident began. *Include the name and address of each insurer, policy numbers and the effective dates for each policy*

(A) Comprehensive general liability

(B) Environmental impairment liability

(C) Other policies for which coverage might apply including participation in risk retention pools.

(D) Other

30. List all transfers of any and all assets, real and/or personal property (over \$300.00) made by this organization OTHER THAN IN THE ORDINARY COURSE OF BUSINESS, during the last three (3) calendar years and state to whom transfer was made. Describe compensation paid by recipient and to whom.

		Property			Conditions
<u>Date</u>	<u>Amount</u>	<u>Transferred</u>	<u>To Whom</u>	<u>of Transfer</u>	
<hr/>	<hr/>	<hr/>	<hr/>	<hr/>	
<hr/>	<hr/>	<hr/>	<hr/>	<hr/>	
<hr/>	<hr/>	<hr/>	<hr/>	<hr/>	

31. Is this corporation a party in any lawsuit now pending? YES () NO ()
If yes, give details below

32. Please list names and addresses of any persons or other business entity, holding funds in escrow or trust for this organization, or any of its subsidiaries or affiliates.

33. Other information requested:

34. Additional remarks:

35. **VERIFICATION AND AFFIDAVIT**

With knowledge of the penalties for false statements provided by 18 United States Code 1001 (\$10,000 fine and/or five (5) years imprisonment) and with knowledge that this financial statement is submitted by me as a responsible officer of this organization to affect potential action by EPA and the Department of Justice, I hereby certify that I believe I completely understand the above statement, and that it is a true and complete statement of all organization income and assets, real and personal, whether held in the company name or otherwise.

Date: _____

Affiant (Officer) Name - Printed

Corporate Position

Signature